

GREENWALD LAW OFFICES
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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**MOHAMED ELMESHAD, individually and on
behalf of others similarly situated,**

Plaintiffs,

-against-

**GHT PETROLEUM, INC., GOLDEN
TOUCH GAS & FOOD, INC., TARLOK
SINGH, and HARINDER SINGH,**

Defendants.

**INITIAL DISCLOSURES OF
DEFENDANTS**

INDEX NO.: 07 CIV 5990

Pursuant to Federal Rule of Civil Procedure 26(a)(1), GHT PETROLEUM, INC., GOLDEN TOUCH GAS & FOOD, INC., TARLOK SINGH, and HARINDER SINGH, hereby make the following initial disclosures. The initial disclosures are based on information now reasonably available, prior to discovery and after making in good faith such inquiry and investigation concerning the activities of Plaintiff MOHAMED ELMESHAD as is reasonable under the circumstances. Defendants reserve the right to correct or supplement these disclosures pursuant to Federal Rule of Civil Procedure Rule 26(a)(1) should it subsequently become aware of additional relevant information to be disclosed. Defendants make these disclosures without waiving any claim of privilege, work product protection, or other for non disclosure, and reserving the right to object to discovery into any listed subject matter.

INITIAL DISCLOSURES**A. Potential Witnesses.**

Pursuant to Rule 26 (a)(1)(A), Defendants hereby disclose the following Potential Witnesses known to its at this time who are likely to have discoverable information relevant to the claims and parties in this case, unless solely for impeachment, along with the possible subjects of their testimony. The witnesses identified below may be contacted in this action only through Defendants' counsel.

Witness Identification**Subject Matter**

Tarlock Singh

Liability and Damages

Haridner Singh

Liability and Damages

Gangit Gogi
GHT Petroleum, Inc.
349 Route 82
Hopewell Junction, New York 12533

Liability and Damages

Mohamed Elmesad

Liability and Damages

B. A description by category and location of all documents, data compilation and tangible things that are in the position, custody or control of the Defendants, and which Defendants may use to support its claims or defenses include: payroll records and time cards of GHT Petroleum, Inc.; payroll records of Golden Touch Gas & Food, Inc.; records of Plaintiff's cell phone calls; and records of Plaintiff's used car business and operations. Said documents, compilations and tangible things were all made and/or maintained by the Defendants or the Plaintiff in the usual course of their businesses, as business records, in connection with the transactions between parties which underlie this litigation.

C. Computation of Damages.

Defendant GHT Petroleum, Inc. claims counterclaim damages for payment and/or overpayment of wages due to Plaintiff. The amount of said sum not known at present. Defendants also seek interest and attorneys fees, which also are incapable of computation at this time. Defendants reserve the right to supplement the computation of damages, per the applicable rules.

D. Insurance Agreements.

Defendants are not aware of any applicable insurance agreements.

E. Expert Witness Testimony .

Defendants have not yet retained the services of any experts who may be used at trial, and specifically reserve the right to identify any expert retained, per the applicable rules.

CERTIFICATE OF DISCLOSURE

The undersigned certifies that, to the best of his knowledge, information and belief formed after the inquiry that is reasonable under the circumstances, the above disclosure is complete and correct at the time it is made.

DATED: Chester, New York
August 8, 2007

GREENWALD LAW OFFICES

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